

EXHIBIT 24

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL)
5 PRESCRIPTION) MDL No. 2804
6 OPIATE LITIGATION)
7 _____) Case No.
8) 1:17-MD-2804
9)
10 THIS DOCUMENT RELATES) Hon. Dan A.
11 TO ALL CASES) Polster
12)

13 WEDNESDAY, APRIL 24, 2019

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
15 CONFIDENTIALITY REVIEW

16 - - -

17 Videotaped deposition of Anna
18 Lembke, M.D., held at the offices of Lief
19 Cabraser Heimann & Bernstein, LLP, 275
20 Battery Street, 29th floor, San Francisco,
21 California, commencing at 8:07 a.m., on the
22 above date, before Carrie A. Campbell,
23 Registered Diplomate Reporter and Certified
24 Realtime Reporter.

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26 GOLKOW LITIGATION SERVICES
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1 some responsibility.

2 Q. All right. So we're going to
3 need to get into that in a little more detail
4 because that was one question I had for you,
5 is you used the term in this report
6 "pharmaceutical opioid industry," but you
7 haven't defined what that -- what you mean by
8 that.

9 Can you explain what you mean
10 by that and who was included in that?

11 A. The pharmaceutical opioid
12 industry, as used in my report, refers to the
13 named opioid manufacturers, the named opioid
14 distributors, and the named opioid dispensing
15 pharmacies.

16 Q. All right. Are you aware of
17 any marketing of opioids that was done by any
18 of the retail chain pharmacies?

19 A. No, I am not.

20 Q. And, in fact, you do not
21 reference any marketing of opioids by any of
22 the retail chain pharmacies in your report;
23 isn't that correct?

24 A. That is correct.

25 Q. So when you have talked during

1 opinion on that; is that correct?

2 A. That's correct.

3 Q. And you don't have that opinion
4 to a reasonable degree of medical certainty;
5 is that correct?

6 MR. ARBITBLIT: Object to form.

7 THE WITNESS: Well, I have that
8 opinion, and I'm pretty certain about
9 it, but I wasn't asked to opine on it
10 in my report.

11 QUESTIONS BY MR. LAVELLE:

12 Q. Okay. If you believe that
13 doctors were duped into increasing opioid
14 prescriptions, do you believe pharmacists
15 were also duped?

16 A. I think it's possible that on
17 an individual basis some pharmacists were
18 also not aware of the dangers with opioids.
19 It's possible.

20 Q. It's possible, but you're not
21 certain?

22 A. That's right.

23 Mainly because I'm not as
24 familiar with pharmacy training as I am with
25 physician training.